

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

8/16/2024

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address))
 UPS NEXT DAY AIR)
 PACKAGE WITH TRACKING NUMBER)
 1Z02083R1316310246)
)
 Case No. 3:24-mj-532

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
 a UPS Parcel with tracking number 1Z02083R1316310246 addressed to [REDACTED]
 [REDACTED]

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

controlled substances and packaging materials

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 USC s. 846	attempt to distribute controlled substances
21 USC s. 843(b)	use of a communication facility to facilitate a Title 21 offense

The application is based on these facts:

See Attached Affidavit of Jordan Gula

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Jordan Gula
Applicant's signature

Jordan Gula, SA of the FBI

Printed name and title

(telephone)

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means.

Date: August 16, 2024

City and state: Dayton, Ohio

Gentry
Caroline H. Gentry
United States Magistrate Judge



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF:
UNITED PARCEL SERVICE (UPS)
NEXT DAY AIR
PACKAGE WITH TRACKING NUMBER
1Z02083R1316310246

Case No. 3:24-mj-532

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, **Jordan D. Gula**, being first duly sworn, hereby depose and state as follows:

1. I, Special Agent Jordan D. Gula, am employed by the Federal Bureau of Investigation and have been since January 2016. As a Special Agent by the Federal Bureau of Investigation (FBI) I am currently assigned to the FBI's Southwest Ohio Safe Streets Task Force which investigates violent crime matters including criminal enterprise activities, incidents impacting interstate commerce, commercial and home invasion style robberies, carjackings, kidnappings, and assaults on Federal Officers. I have participated in numerous drug investigations involving violations of federal, state, and local laws, including investigations of multi-national criminal organizations, firearms violations, and drug trafficking violations. I have extensive prior experience in investigating drug cases that resulted in successful prosecution of persons involved in trafficking of drugs, possession of drugs and other related offenses. I have been involved in narcotics related arrests, executed search warrants that resulted in the seizure of narcotics and participated in undercover narcotics purchases. Through training and experience, I am familiar with the way persons involved in the illicit distribution and sales of controlled substances often operate. These subjects usually attempt to conceal their identities, the locations at which they

reside, where they store controlled substances, and the illegal proceeds derived from the sale of controlled substances.

2. Based on my prior training and experience as a Special Agent of the Federal Bureau of Investigation, I have become aware that drug traffickers frequently use overnight or priority mail and parcel services to transport drugs and/or proceeds. Additionally, because of my prior investigations, law enforcement training, experience of other involved law enforcement investigators, and successful controlled-substance prosecutions involving use of the parcel delivery services, I have learned of certain common characteristics and/or circumstances that indicate a particular package may contain Drugs and/or Proceeds. These circumstances and/or characteristics include, but are not necessarily limited to, the following: the shipper uses different post offices on the same day to send packages, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanate from the package, and the listed address is located in an area of known or suspected drug activity.

3. On August 15, 2024, the Federal Bureau of Investigation Safe Streets Task Force (SSTF) lawfully intercepted one package (hereinafter “the Package”) at the UPS Customer Center at 1308 Brandt Pike, Dayton, Ohio.

4. The Package was a brown box weighing approximately one pound with tracking number 1Z02083R1316310246. Shipping information from UPS showed that the package was shipped on August 14, 2024, via next day air service with the following shipping information:

Sender:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Addressee:

[REDACTED]
[REDACTED]
[REDACTED]

Through training and experience as an SA with the FBI, I know that Southern California has been long known as a drug source location. Additionally, I am aware of multiple ongoing state and federal investigations into drug trafficking organizations in Southern California who use UPS as a mechanism to distribute illegal drugs around the United States.

5. I performed a check in ACCURINT for the recipient information listed on the Package: [REDACTED], [REDACTED]

[REDACTED] ACCURINT is a law enforcement database that is used as a tool for investigators to identify persons/businesses and associated address information. According to ACCURINT, there is no [REDACTED]

6. I performed a check in ACCURINT for the sender's information listed on the Package: [REDACTED] According to ACCURINT, there is a [REDACTED]

[REDACTED] associated with telephone number [REDACTED]

7. On August 15, 2024, at the request of the SSTF, Montgomery County Sheriff's Office K9 Detective Tony Hutson conducted a narcotics-detection canine "free air" check of the

outside of the Package. SSTF investigators were present during the check. Prior to conducting the “free air” check, the Package was placed in an outdoor area with multiple similar and like packages. As set forth in the attached affidavit of K9 Detective Hutson, “Hank” alerted positively for the presence or odor of a narcotic or other controlled substance exuding from Package. “Hank” is a properly trained and certified narcotics-detection canine.

8. Based on my law enforcement training and experience as a Special Agent of the Federal Bureau of Investigation, the Package’s address information, – including the absence of a person identified as the recipient at the recipient address – the positive alert of the narcotics-detection canine, and the Packages being sent from a known drug source location via UPS Next Day Air are all indicative of and consistent with Drugs and/or Proceeds being present in the Package.

9. Therefore, I request a search warrant to open the Package and search it for the presence of narcotics or other controlled substances, as well as packaging material that may contain fingerprints, DNA, or other identifying information concerning the sender of this parcel.



Jordan D. Gula

SA of the FBI

By telephone
Sworn to on August 16, 2024

Caroline H. Gentry
United States Magistrate Judge





Montgomery County
Regional Agencies Narcotics & Gun Enforcement

OFFICER AFFIDAVIT

I, Officer Anthony Hutson, am and have been employed by the Montgomery County Sheriffs Office since 1998. Among other duties, I am currently the assigned handler of narcotics detection canine "HANK" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Cocaine, Methamphetamine, Heroin and Derivitives

On August 15, 2024, at the request of Special Agent Gula, I responded to the UPS Distribution Center located at 1308 Brandt Pike, Dayton, Ohio, where "HANK" did alert to and indicate upon: [describe item]

UPS Tracking #1Z 020 83R 13 1631 0246

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Which, based upon my training and experience and that of "HANK", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

Det GJW/101 8-15-24
(Signature, Badge #, and Date)

(Witness/Date)